

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:25-cv-00462-G
)	
PLAZA HOTELS, LLC; STEVE KETTER;)	
MICHAEL WILEY; OKC AIRPORT ES, LLC;)	
ESH STRATEGIES FRANCHISE, LLC;)	
KAJAL HOSPITALITY, INC; JALIYAN)	
HOSPITALITY, INC; SUPER 8 WORLDWDE,)	
INC; RAJ KRUPA HOTEL, LLC; DAYS INNS)	
WORLDWIDE, INC; CHAND & SAAJ)	
HOSPITALITY, INC; RAMADA)	
WORLDWIDE, INC; YASH ENTERPRISES,)	
INC; HOWARD JOHNSON)	
INTERNATIONAL, INC; NOOR HOTEL, LLC;)	
AMBICA, LLC; OM, LLC; INDRA, LLC; AND)	
G6 HOSPITALITY FRANCHISING, LLC,)	
Defendants.)	

**DEFENDANT RAJ KRUPA HOTEL, LLC’S UNOPPOSED MOTION TO EXTEND TIME
OR OTHERWISE RESPOND TO COMPLAINT UNDER RULE 12**

Defendant, Raj Krupa Hotel, LLC (“Raj Krupa”) under LCvR6.3, files this, its request for an unopposed extension of time to file motions or a responsive pleading under Rule 12 of the Federal Rules of Civil Procedure, showing in support as follows:

1. Plaintiff, Nancy R. (“Plaintiff”) initiated the litigation in the above-styled and captioned matter with an action captioned *Nancy R., pseudonymously v. Plaza Hotels, LLC, et al.*, Cause Number CJ-2025-1850 in the District Court of Oklahoma County, State of Oklahoma. In Plaintiff’s state court petition, Plaintiff asserted claims against the collective Defendants related to the Trafficking Victims Protection Reauthorization Act and Oklahoma Human Trafficking laws, *inter alia*.

2. On April 23, 2025, Defendants Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. (collectively, the “Wyndham

Franchisor Defendants”) removed this case to the United States District Court for the Western District of Oklahoma under 28 U.S.C. § 1331. [ECF No. 1.]

3. The Wyndham Franchisor Defendants’ removal triggered Federal Rule of Civil Procedure 81(c), requiring defendants who did not answer before removal to answer or present other defenses or objections within 7 days after the notice of removal is filed, or within 21 days of service of the summons and petition, whichever is later. Fed. R. Civ. P. 81(c). Thus, upon information and belief, the responsive pleading date for Defendant Raj Krupa in this Court is currently April 30, 2025.

4. On April 30, 2025, Plaintiff and the Defendant Raj Krupa agreed to a 60-day extension of time to respond to Plaintiff’s Petition until June 29, 2025. Defendant Raj Krupa now seeks an extension in this Court to reflect the agreed-upon deadline with Plaintiff’s counsel.

Dated: April 30, 2025

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025, I electronically transmitted the foregoing document to all parties' counsel as outlined further below, in accordance with the Federal Rules of Civil Procedure:

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